

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
BUFFALO DIVISION

---

Krummholz International, Inc. and

Swissdigital USA Co., Ltd.,

Plaintiffs,

v.

Docket No.: 1:15-CV-86-WMS

Wenger, S.A.,

Defendant.

---

**STIPULATION AND ORDER GRANTING DEFENDANT EXTENSION OF TIME TO  
ANSWER COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between the Plaintiffs, Krummholz International, Inc. and Swissdigital USA Co., Ltd. (collectively, "Plaintiffs"), and the Defendant Wenger S.A. ("Defendant"), by and through their respective attorneys as follows:

1. The Court entered an Order on June 11, 2015 granting leave to Plaintiffs to file a Second Amended Complaint and requiring Defendant to move, answer or otherwise respond within 21 days of the date on which the Second Amended Complaint was filed (Dkt No. 15);
2. Plaintiffs filed a Second Amended Complaint on June 23, 2015 (Dkt. No. 19), and Defendant's response is currently due on July 14, 2015;
3. The Parties are also involved in litigation filed in the United States District Court for the District of Nevada on June 10, 2015 by Wenger S.A. against the two plaintiffs in this action (Krummholz International and Swissdigital USA) and three other defendants ("the Nevada Action").

4. The Parties have agreed to an adjustment of time for Defendant Wenger S.A. to answer or otherwise respond to the Second Amended Complaint in this matter in connection with a proposal to transfer of the Nevada Action to the Western District of New York; and

5. The Parties consent to a 30-day extension of time until August 13, 2015 for Wenger S.A. to answer, move or otherwise respond to the Second Amended Complaint filed June 23, 2015 (Dkt # 19).

**PURSUANT TO THE STIPULATION OF THE PARTIES SET FORTH ABOVE; IT IS HEREBY ORDERED THAT:**

Defendant Wenger is granted a 30-day extension of time to August 13, 2015 to answer, move or otherwise respond to the Second Amended Complaint filed June 23, 2015.

Dated: July \_\_\_\_, 2015  
Buffalo, New York

CONSENTED TO ON JULY 10, 2015 BY:

s/ James W. Grable, Jr.  
James W. Grable, Jr.  
Connors & Vilardo, LLP  
1000 Liberty Building  
424 Main Street  
Buffalo, New York 14202  
Telephone: (716) 825-5533  
Facsimile: (716) 852-5649  
[jwg@connors-vilardo.com](mailto:jwg@connors-vilardo.com)

---

HON. WILLIAM M. SKRETNY  
UNITED STATES DISTRICT JUDGE

s/ Dariush Keyhani  
Dariush Keyhani (DK 9673)  
Jennifer Meredith (JM-4816)  
Meredith & Keyhani, PLLC  
205 Main Street  
East Aurora, NY 14052  
Telephone: (716) 898-8938  
Facsimile: (716) 299-2499  
[dkeyhani@meredithkeyhani.com](mailto:dkeyhani@meredithkeyhani.com)

Attorneys for Plaintiffs

Richard H. Brown  
Day Pitney LLP  
7 Times Square  
New York NY 10036  
Telephone: (212) 297-5854  
Facsimile: (212) 916 2940  
[rbrown@daypitney.com](mailto:rbrown@daypitney.com)

Attorneys for Defendants